

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

JANE DOES 1-9,

PLAINTIFFS

vs.

**COLLINS MURPHY, SHARON
HAMMONDS, BRENDA F. WATKINS,
LIMESTONE UNIVERSITY, MG
FREESITES, LTD., d/b/a
PORNHUB.COM, MG FREESITES II
LTD., MINDGEEK S.A.R.L., MINDGEEK
USA, INC., MG BILLING LTD., and
HAMMY MEDIA LTD. d/b/a
XHAMSTER.COM, TRAFFICSTARS
LTD., WISEBITS LTD, XHAMSTER IP
HOLDINGS LTD, WISEBITS IP LTD.**

DEFENDANTS

Case No.: 7:20-cv-00947-DCC

PLAINTIFFS' MOTION TO SEAL EXHIBITS

YOU WILL PLEASE TAKE NOTICE that the Plaintiffs, by and through counsel, will move before this Honorable Court for an Order allowing the Plaintiffs to file one exhibit under seal, in connection with their Response in Opposition to Defendants Motion to Dismiss. This Motion is made pursuant to Local Civil Rule 5.03.

In support of this motion Plaintiffs file: (1) a Memorandum in Support; (2) a non-confidential index of the documents at issue; (3) Counsel's certification of compliance with Local Rule 5.03; and (4) a separate attachment labeled Confidential Information to be submitted to the Court in connection with Motion to Seal.

Upon consultation, with Counsel for the Defendants, they have consented to this

Motion to Seal.

Respectfully submitted,

BELL LEGAL GROUP, LLC

s/J. Edward Bell, III

J. Edward Bell, III (1280)

Joshua M. W. Salley (13214)

219 North Ridge Street

Georgetown, SC 29440

TEL.: (843) 546-2408

FAX: (843) 546-9604

ebell@edbelllaw.com

**DOLT, THOMPSON, SHEPHERD &
CONWAY, PSC**

Tyler S. Thompson (admitted Pro Hac Vice)

Liz J. Shepherd (admitted Pro Hac Vice)

Jordan A. Stanton (admitted Pro Hac Vice)

13800 Lake Point Circle

Louisville, KY 40223

Telephone: (502) 244-7772

tthompson@kytrial.com

lshepherd@kytrial.com

jstanton@kytrial.com

**NATIONAL CENTER ON SEXUAL
EXPLOITATION**

Benjamin Bull (admitted Pro Hac Vice)

Danielle Bianculli Pinter (admitted Pro Hac Vice)

Christen Price (admitted Pro Hac Vice)

Peter Gentala (admitted Pro Hac Vice)

1201 F Street NW

Washington, D.C. 20004

bbull@ncose.com

dpinter@ncoselaw.org

cprice@ncoselaw.org

pgentala@ncoselaw.org

ATTORNEYS FOR PLAINTIFF

January 5, 2023

Georgetown, SC